

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-105-JJF
	:	
SHANNEON MOORE,	:	
	:	
Defendant.	:	

MOTION FOR CONTINUANCE OF RULE 11 (CHANGE OF PLEA) HEARING

Defendant, Shanneon Moore, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court for an order rescheduling the Rule 11 (Change of Plea) hearing in this case.

In support of the motion, the defense submits as follows:

1. Mr. Moore is currently scheduled for a Change of Plea hearing on February 16, 2007.
2. Defense counsel starts a jury trial on an unrelated case on February 14, 2007.

Although it is anticipated that this trial will be finished by February 16, 2007, there is the possibility that the trial may go into February 16, 2007. Due to this potential scheduling conflict, the defense respectfully requests that Mr. Moore's Change of Plea hearing be rescheduled.¹

3. Assistant United States Attorney Ilana Eisenstein, the attorney handling this case for the government, does not oppose this request for a continuance.

4. The defense agrees to waive any time, pursuant to the Speedy Trial Act, between the February 16, 2007 original date for the hearing and the rescheduled date.

¹Defense counsel will be unavailable the week of February 19, 2007.

WHEREFORE, it is respectfully requested that the Court reschedule Mr. Moore's Change of Plea hearing to another date.

Respectfully submitted,

/s/

Eleni Kousoulis, Esq.
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Attorney for Defendant Shanneon Moore

Dated: February 6, 2007

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FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
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Plaintiff,	:	
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SHANNEON MOORE	:	
	:	
Defendant.	:	

ORDER

Having considered Defendant's Motion for Continuance of Rule 11 (Change of Plea) Hearing,
IT IS HEREBY ORDERED this _____ day of _____, 2007, that Defendant
Moore's Rule 11 (Change of Plea) Hearing shall be rescheduled to the _____ day of
_____, 2007, at _____ a.m./p.m.

Honorable Joseph J. Farnan, Jr.
United States District Court